



**U.S. DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Admin.**  
National Ocean Service  
Office of Ocean Resource Conservation and Assessment  
Hazardous Materials Response and Assessment Division  
c/o EPA Office of Site Remediation and Restoration (HIO)  
1 Congress Street  
Boston, MA 02114  
4 March 2002

Ms. Kymberlee Keckler  
U.S. EPA Waste Management Division  
1 Congress Street  
Boston, MA 02114

Mr. James Shafer  
U.S. Department of the Navy  
Northern Division - NAVFAC  
10 Industrial Highway  
Code 1811/PO - Mail Stop 82  
Lester, PA 19113-2090

Dear Kymberlee/Jim:

Thank you for the Draft Sediment Predesign Investigation for the Old Fire Fighting Training Area, Naval Station Newport, Newport, Rhode Island; prepared by Tetra Tech, NUS, Inc., February 2002. NOAA reviewed the possible action areas but was left with several questions or misunderstandings. They are numbered below:

1. NOAA reviewed Figures 4-1 (locations exceeding PRGs) and Figure 4-2 (possible action areas) but could not follow how the shape of the possible action areas was drawn. Hence, we are unclear how much sediment actually needs to be removed; it appears from Figure 4-2 that the Navy may be too aggressive in selecting areas for cleanup.
2. As described, Station 410 exceeds several PRGs of the PAH group. And clearly the shape of the possible action area is an estimate with more data to follow. Although NOAA is very concerned about the removal of eelgrass beds we are equally concerned about excessive contamination left in place thereby potentially posing as an attractive nuisance to those juvenile organisms that utilize the habitat. Therefore, although the Navy states that the eelgrass beds appear healthy, the impacts to other organisms are quite possible. However, NOAA presently is not advocating the removal of a large amount of the eelgrass.
3. Potential sediment removal at Station #6 should be discussed further. Here, in the area at, or below, low tide only one exceedence of a PRG was shown – methylnapthalene at 170 ppb. Ecological risk was not identified here due to the measurement of low effects. As stated above, we do not understand the shaded possible action area but also do not believe that this location deserves such attention.

Please let me know if you have any questions. Much of my discussion relates more to the methods than to any change in remedial action areas.

CC: Cornell Rosiu (EPA)

Sincerely,

A handwritten signature in black ink, appearing to be 'KF', with a long horizontal stroke extending to the right.

Kenneth Finkelstein, Ph.D.